

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF ILLINOIS

EASTERN DIVISION

Peter Obazuaye, Plaintiff

Vs

)

) Case 1:19-cv-04933

Illinois department of human service, (Defendant) Judge Ruben Castillo

Illinois nurses association,

)

Magistrate Judge

Elgin mental health center,

)

Jeffrey T. Gilbert.

John Gordon,

Diana Hogan,

Jeffrey Pilario,

Daisey Juntilla,

Michael Palad

I began my employment with Respondent on or about November 16, 2005. My current position is Registered Nurse II. During my employment, I was denied a promotion. On or about September 16 and March 3, 2017, I filed a charge of discrimination (IDHR# 21B-2017-00976).

Subsequently, Respondent failed to notify me of upcoming layoffs with sufficient time that would have allowed me to apply for two promotions. As a result, I was transferred to Respondents location in Elgin.

I am being discriminated against in retaliation for engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended.

The Defendants engaged in a "separate but equal" policy/facility. African American and black races Nurses are treated differently In regards to hiring and Promotion compare to White and Filipinos Nurses.

**Violation of Title VII- Equal employment opportunity.
Brown Vs Board of education of Topeka 347 us. 483 1954.**

The defendant, John Gordon retaliated against me and his action was a hate crime because I complained of his discrimination of service to the poor black and minority blind customers at Illinois center for Education and rehabilitation, WOOD.

John Gordon engaged in harassment through electronic communication and criminal trespass to my office desk space.

Violation to Illinois statutes Chapter 727, criminal offense, "Hate Crime" against employee of color and national origin. I have a police report to this matter. (see document listed 1-7)

The Defendant uses Nurses of national origin to perform jobs responsibility of Public Service administration and pay as Registered Nurses II. All incumbent administrative nurse on duties were all White with salary pay as Public Service Administration.

This claim is true and correct to the best of my knowledge and belief.

Sincerely,

A handwritten signature in black ink, appearing to read 'pobazuaye', written in a cursive style.

Peter Obazuaye.

1433 Victoria Avenue,

Berkeley. Il. 60163,

708-620-9870

peterobazuaye@hotmail.com

#1

VICTIM INFORMATION NOTICE/ CHICAGO POLICE DEPARTMENT

INCIDENT OTHER NOV 2014 IUCR CODE PETTER

NAME OF VICTIM/COMPLAINANT OSCAR AYER

CASE NAME - PEOPLE OF THE STATE OF ILLINOIS/CITY OF CHICAGO vs.

If an arrest has taken place, the following is your court information: Date: _____

If you need more help call the Victim/Witness Assistance Program of the Cook County State's Attorney's Office at (773) 869 - 7200.

Court Loc: _____

Court Branch: _____

Time: _____

Your case will be on file with the Chicago Police Department under the above listed R.D. Number. Refer to this number whenever you are communicating with the Chicago Police Department concerning this incident. Your case will be assigned for follow-up investigation based upon specific facts obtained during the initial investigation. The presence of these facts can predict whether a comprehensive follow-up investigation would likely result in the arrest and prosecution of the suspect(s) or the recovery of property. Your case will be reviewed and retained to determine if criminals active in the area can be identified. A detective will not routinely contact you unless additional information is required or your further assistance is needed.

TO REPORT ADDITIONAL INFORMATION

If you have knowledge of specific facts which might assist in the investigation of your case, please contact the unit marked below:

	PROPERTY CRIMES	VIOLENT CRIMES	SPECIAL VICTIMS
AREA CENTRAL	<input type="checkbox"/> (312) 747-8382	<input type="checkbox"/> (312) 747-8380	<input type="checkbox"/> (312) 747-8385
AREA SOUTH	<input type="checkbox"/> (312) 747-8273	<input type="checkbox"/> (312) 747-8271	<input type="checkbox"/> (312) 747-8274
AREA NORTH	<input type="checkbox"/> (312) 744-8263	<input type="checkbox"/> (312) 744-8261	<input type="checkbox"/> (312) 744-8266
BOMB SECTION	<input type="checkbox"/> (312) 746-7180	ARSON SECTION	<input type="checkbox"/> (312) 746-7618

MISSING PERSONS LOCATED

☐ When persons reported missing are located or have returned, the MISSING PERSONS SECTION must be contacted IMMEDIATELY at (312) 747-5789 or (312) 747-2881.

COPY OF THE REPORT

The above listed R.D. Number may suffice for insurance purposes. However, there may be instances when a copy of the case report is desired. A copy of the case report which verifies that an incident of injury, loss or damage has been reported to the Chicago Police Department may be obtained after 14 working days from the date the incident was reported. To obtain a copy of the report, send a check or money order payable to the "DEPARTMENT OF REVENUE-CITY OF CHICAGO" in the amount of \$.50 and a self-addressed stamped return envelope to: Chicago Police Department Headquarters, Records Inquiry Section, 1st floor, 3510 South Michigan Avenue, Chicago, Illinois 60653. Include the following information with your request: 1) Victim's name and address (or person reporting crime), 2) Type of incident, 3) Address of occurrence, and 4) R. D. Number.

MAKE THE RIGHT CALL

To report a crime in progress or other emergency that requires immediate police response, call 911. To report non-emergency situations, call the Police Department at 311 within City limits, or if outside the City limits call (312) 746-6000.

CHICAGO ALTERNATIVE POLICING STRATEGY (CAPS)

SAFE NEIGHBORHOODS ARE EVERYBODY'S BUSINESS

The police alone cannot solve the problems of crime in our City. It takes an active and informed community working with the police and other City agencies to really make a difference. Join your neighbors and your neighborhood police officers as we work together to reduce crime and improve the quality of life in our City. Become part of the CAPS team in your community. To find out how, call 311 or visit online at: <http://www.chicagopolice.org>.

You live on Beat _____

Your next Beat Community Meeting will be held on (date / time) _____

at (location) _____

CPD-11.383 (Rev. 5/13)-English

IMPORTANT: RETAIN THIS NOTICE FOR YOUR PERSONAL RECORDS

TELECOMMUNICATIONS DEVICE FOR THE DEAF/TELETYPE (TDD/TTY)

Hearing-impaired persons who possess such equipment may communicate with the Chicago Police Department 24 hours a day by calling (312) 746-9715. Hearing-impaired persons in need of assistance during normal business hours may also contact their local police district or the Special Activities Section at (312) 745 - 5823.

OBTAINING A WARRANT OR SUMMONS FOR CRIMINAL CHARGES

If an arrest is made, you will be informed of the date, time, and location of the court proceedings at which your appearance will be required. When you report a crime and an arrest is not made, you may go in person to the appropriate court listed below to request that criminal proceedings be initiated by way of a warrant or summons. Bring this Victim Information Notice and any other relevant information, such as the offender's name, physical description, and home address to the warrant officer assigned to the court between 8:30 am and 11:30 am Monday through Friday (excluding court holidays). The warrant officer will then assist you in the process of obtaining the warrant or summons.*

Police District of Occurrence

<input type="checkbox"/>	14,15,16,17,25
<input type="checkbox"/>	1,18,19,20,24
<input type="checkbox"/>	2,7,8,9
<input type="checkbox"/>	3,4,5,6,22
<input type="checkbox"/>	10,11,12

Court Branch for Warrant or Summons

Branch 23	5555 W. Grand Ave.
Branch 29	2452 W. Belmont Ave.
Branch 34	155 W. 51st St.
Branch 35	727 E. 111th St.
Branch 43	3150 W. Flournoy St.

* For incidents relating to domestic violence, a warrant/summons will only be issued from the Domestic Violence Court located at 555 West Harrison, on the first floor.

AUTOMATED VICTIM NOTIFICATION (AVN)

The County of Cook has a toll free, multilingual, 24-hour Automated Victim Notification System. To obtain information about a defendant's court date or custody inside of Cook County Jail: call 1-877-846-3445. Do not depend only on the AVN for your safety. If you feel that you may be in danger, take precautions as if the defendant has already been released.

ILLINOIS CRIME VICTIMS NOTIFICATION

Innocent victims of violent crime may be eligible to receive benefits from the Illinois Crime Victims Compensation program for such costs as medical, funeral, loss of support, and wage loss. NO RECOVERY IS PROVIDED FOR PROPERTY LOSS OR DAMAGE, NOR FOR PAIN OR SUFFERING. To apply or to determine whether one qualifies, the victim, or if deceased, a relative or dependent, must contact the Illinois Attorney General's Office. Further information and claim forms can be obtained from the Crime Victims Compensation Program, Office of the Attorney General of Illinois, 100 West Randolph Street, 13th Floor, Chicago, Illinois 60601, or by calling (312) 814-2581 or 1-800-228-3368, TTY: 1-877-398-1130 or email at crimevictimservices@atg.state.il.us.

RECOVERY OF PROPERTY - STOLEN VEHICLE RECOVERED

The Chicago Police Department must be notified IMMEDIATELY, via the "911" emergency number, when property reported lost or stolen is recovered.

CREDIT CARDS - CHECKS, LOST OR STOLEN

Immediately notify the concerned credit card issuer or bank by telephone to reduce the possibility of being liable for the unauthorized use of your lost or stolen credit card or check. It is suggested that you also inform the credit card issuer or bank in writing as a follow-up measure to ensure proper notification.



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Chicago District Office

500 West Madison St., Suite 2000
Chicago, IL 60661
PH: (312) 869-8000
TTY: (312) 869-8001
ENFORCEMENT FAX: (312) 869-8220
LEGAL FAX: (312) 869-8124

NOTICE TO ALL EMPLOYEES:
RETALIATION IS ILLEGAL

The U.S. Equal Employment Opportunity Commission (EEOC) has alleged that there is reasonable cause to believe that the Illinois Department of Human Services (IDHS) has violated Title VII of the Civil Rights Act of 1964, as amended (Title VII); the Equal Pay Act of 1963, as amended (EPA); the Americans with Disabilities Act of 1990, as amended (ADA); the Age Discrimination in Employment Act of 1967, as amended (ADEA); and the Genetic Information Non-discrimination Act of 2008 (GINA) concerning the language used in agreements resolving grievances. IDHS denies the claim but to resolve the concern, EEOC and IDHS entered in to a Conciliation Agreement which provides, among other things, that:

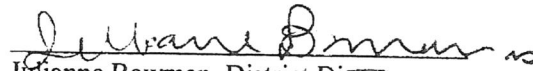
- 1) IDHS will change the language in Grievance Resolution Agreements ("GRA") to make it clear that employees who sign them may communicate with the EEOC, including filing charges of discrimination with the EEOC;
- 2) For GRAs resolved on or after January 1, 2014 resolving allegations of discharge; on or after January 1, 2016 resolving allegations of any type of adverse employment action; or on or after April 1, 2016 resolving any other allegations, IDHS agrees to toll the dates for filing charges of discrimination;
- 3) IDHS will make regular reports to EEOC regarding its compliance with the Conciliation Agreement; and,
- 4) IDHS will provide training to its Labor Relations and Human Resources managers on the requirements of Title VII, the ADA, the ADEA, the EPA, and GINA.

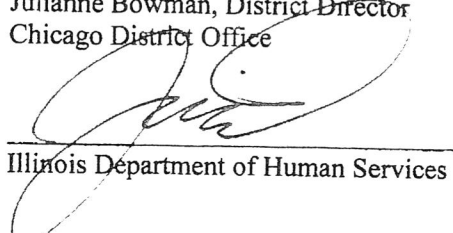
Federal law also prohibits retaliation against any applicant or employee because the applicant or employee files an employment discrimination charge against the employer, opposes employment discrimination, or cooperates with or participates in the Government's investigation of a charge of discrimination. Should you have any complaints or questions regarding employment discrimination, you can contact the EEOC office at the address and telephone number shown above.

THIS IS AN OFFICIAL NOTICE AND MUST NOT BE DEFACED. This notice must remain posted as agreed upon by all parties and must not be altered, defaced, or covered by any other material. Any questions concerning this notice or compliance with its provisions may be directed to the EEOC at the above address and telephone number.

9-30-16
Date

9-26-16
Date


Julianne Bowman, District Director
Chicago District Office


Illinois Department of Human Services

Obazuaye, Peter

From: Obazuaye, Peter
Sent: Wednesday, June 15, 2016 12:50 AM
To: Phillips, Derrick
Cc: John.Gordon@illinois.gov; Bridges, Sherrie; Grimes, Antonine
Subject: Unsafe work environment .

Mr. Phillip.

Failure to fill vacant positions is a potential for unsafe work environment and negligence. All job classifications has a required education and training . The practice in the past and present to utilize state employees with no formal training or certification as residential care worker Is wrongdoing and unsafe for customers.

We serve visually impaired population that requires safe and a good living skill environment. The budget situation is critical but we cannot compromise Cost to safety and living independent. (The first priority in health care is SAFETY). There are many options to consider if we want to reduce cost and I have reasonable cost saving measures to offer.

One of our job duties as a Registered Nurse is to advocate for the customers and advice facility management on safety issues.

Sincerely,

Peter O. Obazuaye , RN II
Medical Department
Illinois Center for Rehabilitation & Education-Wood
1151 South Wood Street
Chicago, IL 60612
Tel. No: 1-312-633-3530
Fax No: 1-312-633-5243
E-Mail: Peter.Obazuaye@illinois.gov

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DHS users are solely responsible for maintaining the confidentiality of the information."

#4

Obazuaye, Peter

From: Obazuaye, Peter
Sent: Tuesday, January 29, 2019 12:39 PM
To: Phillips, Derrick
Cc: Gordon, John; Aglikin, Maria; Bridges, Sherrie; Tozzi, Daniel; Julia Bartmes (JBartmes@illinoisnurses.com)
Subject: Unjust layoff and unequal employment opportunity to fill permanent vacant position in employing facility.

Mr. Phillips,

I humbly wish to bring to your attention that in 2016 and 2017 respectively, you notified the medical staff (Nurses and Doctor) that the management is proposing to lay off the medical department. I have expressed to you as my immediate supervisor about my interest to seek after a permanent vacant position outside of my bargaining unit (RC023) in the employing facility.

In 2016 and 2018, I had the opportunity to avoid pending layoff by applying for a posted permanent position (Public service administration Opt. 8N or Executive II). This position is a nurse and a supervisor for the residential care worker. The management focused on budget problem not a solution. The position PSA Opt. 8N is able to perform the two Job duties and responsibilities of the Executive II and Residential care supervisor. I hope the management consider the salary differences.

I had the management meeting yesterday, we are cooperating with the union and labor management. You are the immediate medical department supervisor and you remain silent about this unjust layoff and unequal employment opportunity for current employee to apply and fill permanent position in our employing facility. However, you claimed to staff that you are unaware of this layoff. I am humbly expressing that I am interested to apply for a permanent vacant position in ICRE-WOOD.

I have two options as of today, grievance to find a reasonable solution in good faith or Civil Service Commission on or after a March 15, 2019. I will start an employee's grievance on unjust layoff and failure to give us equal employment opportunity. The management's request for medical staff lay-off was approved in March 2017 and the labor management was notified in Mid November 2019.

Sincerely,

Peter O. Obazuaye , RN II
Medical Department
Illinois Center for Rehabilitation & Education-Wood
1151 South Wood Street
Chicago, IL 60612
Tel. No: 1-312-633-3530
Fax No: 1-312-633-3506
E-Mail: Peter.Obazuaye@illinois.gov

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234049

CMS ILLINOIS DEPARTMENT OF CENTRAL MANAGEMENT SERVICES

8086
GRIEVANT: COMPLETE 1 SET (WHITE, CANARY, PINK) OF THIS FORM, RETAIN PINK COPY FOR YOUR RECORDS AND SUBMIT OTHER COPIES TO IMMEDIATE SUPERVISOR.

GRIEVANCE REPORT AND RECORD

EMPLOYEE NAME Peter O. Obazuaye	POSITION TITLE Registered Nurse II	SOC. SEC. NO. 341-94-5143	AGENCY Rehab/ DHS
WORK ADDRESS 1151 South Wood Street, Chicago, IL 60163		BARGAINING AGENT (IF ANY) RC 023	

STATEMENT OF GRIEVANCE AND RELIEF REQUESTED (INCLUDING CITATION OF ALLEGED RULE VIOLATIONS):

Failure to fill a Public Service Administrator -opt 8N position created a practice to delegate job duties and responsibilities to a facility's superintendent with no nursing education and state license. This practice is inconsistent to the State of Illinois (code of personal conduct) and created safety risk.
see attached copy.

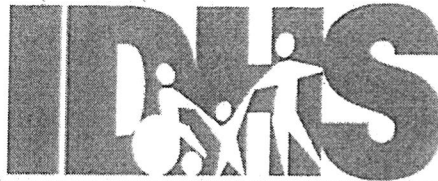
- 1, Promote compliance with applicable laws, policies, rules, and regulations.
- 2, Deter wrongdoing.

Relief Requested-

To fill the job title Public Service Administrator - opt 8N.

STEP 1	DATE SUBMITTED 9/6/16	WE THE UNDERSIGNED HAVE DISCUSSED THIS MATTER ORALLY AND HAVE NOT RESOLVED THE GRIEVANCE.	
	DATE OF RESPONSE 9/17/16	CANNOT BE SETTLED AT THIS LEVEL.	
STEP 2	SUPERVISOR'S SIGNATURE <i>[Signature]</i>	EMPLOYEE'S SIGNATURE <i>[Signature]</i>	
	DATE SUBMITTED 9/16/16	RESPONSE OF NEXT HIGHER LEVEL SUPERVISOR: See attached response copy.	
	DATE OF RESPONSE 9/23/16		
	RESPONSE: <input type="checkbox"/> ACCEPTED <input checked="" type="checkbox"/> REJECTED	EMPLOYEE'S SIGNATURE <i>P. Obazuaye</i>	
STEP 2a	DATE SUBMITTED	RESPONSE OF MANAGER (WHERE APPLICABLE):	
	DATE OF RESPONSE		
	RESPONSE: <input type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED		
	MANAGER'S SIGNATURE	EMPLOYEE'S SIGNATURE	
STEP 3	DATE SUBMITTED	RESPONSE OF AGENCY HEAD:	
	DATE OF RESPONSE 12/10/2016	Grievance Denied - No Contract Violation	
	RESPONSE: <input type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED		
	AGENCY HEAD'S SIGNATURE <i>[Signature]</i>	EMPLOYEE'S SIGNATURE	
STEP 4	I HEREBY SUBMIT THIS GRIEVANCE TO THE DIRECTOR OF CENTRAL MANAGEMENT SERVICES FOR REVIEW AND FINAL DETERMINATION.		
	DESIGNATED REPRESENTATIVE	DATE	EMPLOYEE'S SIGNATURE

#6



Bruce Rauner, Governor

Illinois Department of Human Services

James T. Dimas, Secretary

Division of Rehabilitation Services

BUREAU OF BLIND SERVICES

100 W. Randolph Street, Suite 5-300

Chicago, Illinois 60601

(312) 814-3332 (Office) (312) 814-5745 (Fax)

(312) 633-3596 - ICRE-Wood (217) 494-9389 (Cell)

John.Gordon@illinois.gov

September 23, 2016

Mr. Peter Obazuaye
ICRE Wood
1151 South Wood Street
Chicago, IL 60612

Dear Mr. Obazuaye,

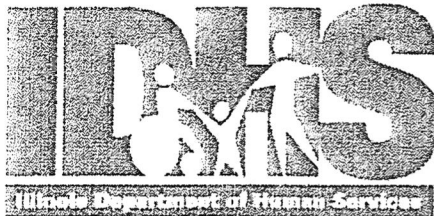
I am responding to your Level 2 Grievance that I attended on Friday, September 16, 2016. I am denying your grievance at this time. It appears you were grieving the fact the Nursing Supervisor position was never posted. Although I have no responsibility in posting positions I did in fact inform our personnel department that ICRE-Wood had no interest in this position at this time.

Thanks,

John P. Gordon
Bureau Chief- BBS

Acknowledged by
Peter Obazuaye

#7



Bruce Rauner, Governor

James T. Dimas, Secretary

100 South Grand Avenue, East • Springfield, Illinois 62762
401 South Clinton Street • Chicago, Illinois 60607

October 20, 2016

Peter O. Obazuaye
1433 Victoria Avenue
Berkeley, Illinois 60163

Re: Internal Discrimination Complaint
Charge No. 0817R0101E
Issue: Failure to promote
Basis: National Origin, Retaliation

Dear Mr. Obazuaye:

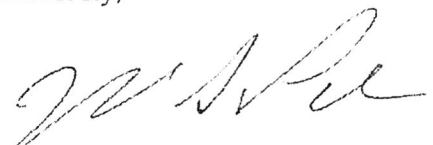
The Bureau of Civil Affairs ("BCA") has completed its investigation of the complaint you filed, alleging discrimination perpetrated by John Gordon.

A careful review has been made of the evidence obtained, as well as of the objective criteria. Based on relevant information obtained through interviews and documents reviewed, it has been determined that there is insufficient evidence to substantiate your complaint. The Bureau of Civil Affairs has concluded its investigation of this matter. Our action has no bearing on the status of any complaint you may have filed with the Illinois Department of Human Rights or the federal Equal Employment Opportunity Commission.

Please Note: *In compliance with all applicable State and federal laws, neither this correspondence nor any information relevant to the filing of this charge is to be shared with any other IDHS staff. Also, no information related to this case is to be filed in your personnel or work file. Additionally, any form of retaliation is unlawful and will not be tolerated.*

If you have any questions or concerns, please contact me at 312-793-6064.

Sincerely,



Jerry Post, Investigations Manager
IDHS Bureau of Civil Affairs

cc: BCA File